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October 16, 2024

**VIA ECF**

Hon. Katharine H. Parker  
United States District Court,  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: *Wood v. ViacomCBS/Paramount*  
Request for Extension  
No. 1:22-cv-06323-JHR-KHP

Dear Judge Parker:

Our firm represents Defendant ViacomCBS/Paramount (n/k/a Paramount Global) ("Defendant") in the above-referenced action.

I am writing to update the October 14, 2024 letter motion I submitted, seeking a brief extension of time for Defendant to respond to Plaintiff Chadd Wood's ("Plaintiff") Second Amended Complaint.

In my October 14 letter motion, I explained that I had e-mailed Plaintiff on Thursday, October 10, 2024 to inquire whether he would consent to the requested extension and Plaintiff had not responded to my e-mail. However, after submitting my October 14, 2024 extension request, Plaintiff responded to my October 10 e-mail and declined to agree to the requested extension. He did not provide a reason for his objection to the extension. Instead, he merely said "Sorry I don't agree with that."

As set forth in my October 14, 2024 letter, I will be out of the office for personal reasons for several days over the next two weeks. Defendant is therefore requesting a brief extension of the deadline to respond to Plaintiff's Second Amended Complaint, from October 22, 2024 to November 8, 2024. This extension is also necessary to ensure that Defendant has time to submit a diligent and comprehensive response to Plaintiff's Second Amended Complaint.

This request will not affect any other deadlines in the case. At present, there are no future court appearances scheduled in this matter.

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Thank you for your consideration of this matter.

Respectfully submitted,  
/s/ Marjorie B. Kulak  
Marjorie B. Kulak

cc: Chadd Wood, Plaintiff *pro se* (via first class mail)